

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:21-CR-238(2)

UNITED STATES OF AMERICA

v.

MARIA ROSARIO SANTILLAN-RODRIGUEZ
a/k/a "Rosario Santillan"

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about April 4, 2019, in the Eastern District of North Carolina, and elsewhere the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario Santillan," did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated she was an individual identifying herself as Rosario Santillan, and that she was born in California, which statement she knew to be false, in violation of Title 18, United States Code, Section 1542.

COUNT TWO

On or about April 4, 2019, in the Eastern District of North Carolina and

elsewhere, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario Santillan," did falsely and willfully represent herself to be a citizen of the United States, in violation of Title 18, United States Code, Section 911.

COUNT THREE

On or about June 11, 2019, in the Eastern District of North Carolina, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario Santillan," did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

COUNT FOUR

On or about June 11, 2019, in the Eastern District of North Carolina and elsewhere, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario Santillan," did falsely and willfully represent herself to be a citizen of the United States, in violation of Title 18, United States Code, Section 911.

COUNT FIVE

On or about August 14, 2019, in the Eastern District of North Carolina, and elsewhere the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario Santillan," did aid and abet Fredy Rene Cruz-Santillan, to knowingly and unlawfully attempt to procure his United States citizenship contrary to law, by providing Fredy Rene Cruz-Santillan her California birth certificate, in support of his Application for Certificate of Citizenship, at which time the defendant knew she obtained the birth certificate by fraud and by means of a false statement, and that

she was in fact born in Mexico and was not a United States citizen, for the purpose of evading a provision of the immigration laws of the United States, in violation of Title 18 United States Code, Sections 1425(b) and 2.

COUNT SIX

On or about August 14, 2019, in the Eastern District of North Carolina, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario Santillan," did aid and abet Fredy Rene Cruz-Santillan, to knowingly and unlawfully make under oath, and to knowingly subscribe as true under penalty of perjury pursuant to Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, that is, the defendant provided Fredy Rene Cruz-Santillan her California birth certificate, in support of his Application for Certificate of Citizenship, at which time the defendant knew she obtained the birth certificate by fraud and by means of a false statement, and that she was in fact born in Mexico and was not a United States citizen, for the purpose of evading a provision of the immigration laws of the United States, in violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT SEVEN

On or about August 14, 2019, in the Eastern District of North Carolina and elsewhere, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario Santillan," did aid and abet Fredy Rene Cruz-Santillan, knowingly make a false statement under oath in a case, proceeding, and matter relating to, and

under, and by virtue of any law of the United States relating to naturalization, citizenship, and registry of aliens, that is, the defendant provided Fredy Rene Cruz-Santillan her California birth certificate, in support of his Application for Certificate of Citizenship, at which time the defendant knew she obtained the birth certificate by fraud and by means of a false statement, and that she was in fact born in Mexico and was not a United States citizen, for the purpose of evading a provision of the immigration laws of the United States, in violation of Title 18, United States Code, Sections 1015(a) and 2.

COUNT EIGHT

On or about October 17, 2019, in the Eastern District of North Carolina, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario Santillan," defendant herein, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating she was not in possession of a Mexican passport that reflected a date of birth XX/XX/1962 to Special Agent Matthew Manning of the Department of State, Diplomatic Security Service, at Louisburg, North Carolina, and the statements and representations were false because, as the defendant then and there knew, she was in possession of the passport at her residence, in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT NINE

On or about February 14, 2020, in the Eastern District of North Carolina, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as "Rosario

Santillan,” did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

COUNT TEN

On or about February 14, 2020, in the Eastern District of North Carolina and elsewhere, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as “Rosario Santillan,” did falsely and willfully represent herself to be a citizen of the United States, in violation of Title 18, United States Code, Section 911.

COUNT ELEVEN

On or about September 22, 2020, in the Eastern District of North Carolina, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as “Rosario Santillan,” did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

COUNT TWELVE

On or about September 22, 2020, in the Eastern District of North Carolina and elsewhere, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as “Rosario Santillan,” did falsely and willfully represent herself to be a citizen of the United States, in violation of Title 18, United States Code, Section 911.

COUNT THIRTEEN

On or about November 3, 2020, in the Eastern District of North Carolina, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as “Rosario

Santillan,” an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

COUNT FOURTEEN

On or about March 24, 2021, in the Eastern District of North Carolina, the defendant, MARIA ROSARIO SANTILLAN-RODRIGUEZ, also known as “Rosario Santillan,” did knowingly possess a California Birth Certificate, a document prescribed by statute and regulation as evidence of authorized stay and employment in the United States, which the defendant knew to have been procured by means of any false claim or statement, and otherwise procured by fraud, in violation of Title 18, United States Code, Section 1546(a).

A TRUE BILL

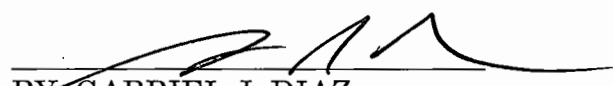
REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

June 3, 2021
DATE

G. NORMAN ACKER, III
Acting United States Attorney


BY: GABRIEL J. DIAZ
Assistant United States Attorney